



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

November 24, 2021

VIA ECF

The Honorable Andrew L. Carter, Jr.
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Abduraman Iseni, et al.*, 20 Cr. 660 (ALC)

Dear Judge Carter:

The Government, after conferring with and receiving the consent of and no objections from defense counsel, respectfully writes to provide the Court with a joint status report in the above-referenced case.

The Government has produced voluminous discovery in this case, and is continuing to produce relevant materials on a rolling basis. The Government has substantially completed Rule 16 productions, though it has a few outstanding items to finalize and produce. The Government understands that defense counsel had technical issues with accessing some of the Government's productions, which the Government is rectifying. The Government has also engaged in plea discussions with the defendants, and still expects to reach dispositions with a number of defendants. The Government respectfully requests that the Court schedule a status conference, or alternatively order that the parties provide another joint status report, for approximately 60 days from now. By that date, the Government expects to submit to the Court the following joint proposed schedule for pretrial motions: opening motions due on or before April 1, 2022; opposition due on or before May 16, 2022; replies, if any, due on or before June 15, 2022. The Government has informed all defense counsel of this proposed approach; no defense attorney has objected.

The Government also respectfully applies to the Court to exclude time to the newly scheduled date, in the interests of justice, pursuant to the Speedy Trial Act, Title 18, United States Code, Section 3161, because such an exclusion is appropriate given the large number of defendants and voluminous discovery productions, and is necessary to allow defense counsel the opportunity for effective preparation and to discuss potential pre-trial dispositions. The Government has also asked defense counsel their position on the exclusion of time; no defense attorney has objected.

The Government is available to answer any questions the Court may have.

Very truly yours,

DAMIAN WILLIAMS
United States Attorney

by: /s/

Samuel Raymond / David R. Felton
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cc: All Defense Counsel (by ECF)